

WITNESS AND EXHIBIT LIST

UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION	
Main Case No: 24-31596	Name of Debtor: MMA Law Firm, PLLC
Witnesses: John Zachary “Zach” Moseley Miriam Goott Johnie Patterson Pedro J. Obando Morgan Weaver Gallacher Misty Segura David Miller Any other witnesses called by Debtor, or any other party Rebuttal/impeachment witnesses	
	Judge: Honorable Eduardo V. Rodriguez
	Courtroom Deputy: Ana Castro
	Hearing Date: September 24, 2024
	Hearing Time: 10:00 a.m.
	Parties’ Names: Equal Access Justice Fund, LP and EAJF ESQ Fund, LP
	Attorneys’ Names: David Miller (<i>pro hac vice</i>) and Misty A. Segura (Spencer Fane, LLP)
	Attorneys’ Phones: (303) 592-8332; (713) 212-2643
	Nature of Proceeding: Hearing on Debtor’s Emergency Motion to Approve Payment of Prepetition Franchise Tax [ECF No. 297]

EXHIBITS

Ex. #	Description	Offered	Objection	Admitted/ Not Admitted	Disposition
1	Resignation of Registered Agent (01/05/24)				
2	Certificate of Involuntary Termination issued by the Office of the Secretary of State (05/24/24)				
3	Franchise Tax Account Status – Franchise Tax Involuntarily Ended (as of 09/16/24)				
4	D. Miller e-mail to Debtor's counsel (09/16/24)				
5	Certificate of Fact issued by the Office of the Secretary of State (09/17/24)				
6	E-mail exchanges with Debtor's counsel regarding Debtor's request to wait to file notice (09/17/24)				
7	E-mail from Debtor's counsel advising payments made and franchise tax return filed (09/17/24)				
8	E-mail from Debtor's counsel advising of further update from the Debtor regarding payment (09/18/24)				
9	E-mail exchanges with Debtor's counsel regarding payment made by Debtor (09/18/24)				

10	E-mail from Debtor's counsel advising of Debtor's failure to designate an authorized registered agent (09/18/24)				
11	EAJF's Notification of Involuntary Termination of Debtor's Corporate Existence (09/18/24) [ECF No. 295]				
12	Third Interim Order Authorizing Use of Cash Collateral [ECF No. 217]				
13	EAJF's Corrected Notice of Default and Notice of Default directed to the Debtor (09/18/24)				
14	Texas Workforce Commission's Proof of Claim [Claim No. 1] filed 04/11/24				
15	City of Houston's Proof of Claim [Claim No. 2] filed 04/12/24				
16	Lone Star College System's Proof of Claim [Claim No. 3] filed 04/12/24				
17	Department of Treasury – Internal Revenue Service's Proof of Claim [Amended Claim No. 7] filed 09/16/24				
18	Texas Comptroller of Public Accounts [Claim No. 17] filed 08/06/24				
	Exhibits attached to any parties' Witness and Exhibit List				
	Rebuttal/Impeachment Exhibits				

Secured Creditors Equal Access Justice Fund, LP and EAJF ESQ Fund, LP (collectively, “*EAJF*”) reserve the right to amend and/or supplement this Witness and Exhibit List at any time prior to the Hearing.

EAJF reserves the right to use additional exhibits for purposes of rebuttal or impeachment and to further supplement the foregoing list of witnesses and exhibits as appropriate. EAJF also reserves the right to rely upon and use as evidence (i) exhibits included on the exhibit lists of any other party in interest, and (ii) any pleading, hearing transcript, order, or other document filed with the Court in this chapter 11 case.

Dated: September 23, 2024.

Respectfully submitted,

SPENCER FANE LLP

By: /s/ Misty A. Segura
MISTY A. SEGURA
TX Bar No. 24033174
Fed. No. 30751
3040 Post Oak Blvd., Ste. 1400
Houston, TX 77056
Office: (713) 212-2643
E-mail: msegura@spencerfane.com

*Attorneys for Equal Access Justice Fund,
LP and EAJF ESQ Fund, LP*

CERTIFICATE OF SERVICE

I certify that on September 23, 2024, a true and correct copy of the foregoing document was served by electronic service via the Court’s ECF filing system on those parties registered to receive service.

/s/ Misty A. Segura
MISTY A. SEGURA